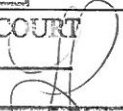


U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED JUL 25 2014 TEXAS CLERK, U.S. DISTRICT COURT By  Deputy

United States District Court

NORTHERN

DISTRICT OF

UNITED STATES OF AMERICA

V.

AMENDED COMPLAINT

HONG MINH TRUONG

CASE NUMBER: 3-14-MJ-576-BF

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Beginning on or about May 7, 2012, in the Dallas Division of the Northern District of Texas, defendant(s) did,


intentionally conveyed false and misleading information, that is white powder, to a school, under circumstances where such information may reasonably have been believed, that indicated that an activity was taking place, that is transferring anthrax, a biological agent,

in violation of Title 18, United States Code, Section(s) 1038(a)(1).

I further state that I am a(n) Special Agent with Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:


See attached Affidavit of Special Agent David D. Rogers, II, (FBI) which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No


Signature of Complainant
DAVID D. ROGERS, II
Task Force Officer, (FBI)

Sworn to before me and subscribed in my presence, on this 25th day of July, 2014, at Dallas, Texas.

PAUL D. STICKNEY
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

INTRODUCTION

1. I have been employed by the Federal Bureau of Investigations ("FBI") as a Special Agent for approximately eight years and I am currently assigned to Joint Terrorism Task Force: Weapons of Mass Destruction (WMD) Investigations of the FBI Dallas Field Division. During my time as a law enforcement officer with the FBI, I have participated in other investigations and have conducted or participated in physical and electronic surveillances; the execution of search warrants; debriefing of cooperating defendants, informants, and witnesses; the use of court authorized wire intercepts; and the review of recorded conversations. Through my training, education, and experience, I have become familiar with the manner in which individuals attempt to deceive, violate and use federal programs to commit violations. I am also familiar with the methods by which individuals use the United States mail system and other federal services to mail threatening correspondence and instill fear into the general public.

2. I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and I am empowered by law to conduct criminal investigations and to make arrests for federal felony offenses. Based on my training and experience investigating counter-terrorism matters, specifically WMD investigations, and

interviews I have conducted with defendants, informants, and other witnesses/participants, directly or indirectly impacted by hoax letters and suspicious packages, I am familiar with these violations and damages resulting from such incidents, including wasting first responder resources and causing federal and private business shutdowns.

3. I have probable cause to believe that, HONG MINH TRUONG has unlawfully committed acts, which are in violation of Title 18, United States Code, section 1038(a)(1), false information and hoaxes.

4. I obtained the following information from my own observations and information provided to me by other law enforcement officers involved in the investigation. I believe the alleged violations exist because of the following:

BASIS FOR PROBABLE CAUSE

5. Since December 2008, approximately 519 letters have been mailed from the North Texas area to cities across the United States and to United States Embassies abroad (Hoax Letters). The initial letters were sent out on December 4, 2008, were postmarked "Dallas, Texas," and contained a white-powder substance. Overall, law enforcement has identified over fifteen batches of letters sent out from the Dallas-area from December 2008 to the present. The language used in and preparation of the letters as well as the method of sending the letters gives me probable cause to believe that one person is responsible for sending the hoax letters. In all but two of the batches of letters, a white-powder substance was included in the envelope.

6. On May 7, 2012, the hoax letters mailed from the Dallas, Texas- area contained a white-powder substance and the following statement:

Al Qaeda back! Special thing for you

What the hell where are you, Scooby Doo, Counter Intelligence, CIA, you do not know how to catch the triple dealer spy in your law enforcement.

What the hell where are you, Scooby Doo, Internal Affairs, FBI, you don't know how to arrest the bad cop in your law enforcement.

You all flaming idiot, ignorant and arrogant, know nothing! How to protect this country! U.S.A

We are Al Qaeda, U.B.L FBI, Al Qaeda, SS Nazi FBI, working in your agency. We claim everything.

These letters were sent to pre-schools and elementary schools across the country as well as to Lockheed Martin in Grand Prairie, Texas. HAZMAT responded to the location of multiple hoax letter recipients, including Mi Escuelita Preschool Crossover in Dallas, Texas. The HAZMAT response was to determine whether any biological agent, toxin or weapon was included in the hoax letters.

7. In June of 2013, 28 Boston Public Schools received letters that resulted in HAZMAT responses. The Boston Public Schools provided the FBI with IP Addresses from Texas that visited the Boston Public Schools website during the period of May 1, 2013 to June 3, 2013. The Boston Public Schools IT Department provided information that a Time Warner Cable Subscriber located at 6602 Rosebud Drive, Rowlett, Texas,

visited three out of the 28 Boston Public Schools websites during the designated time period. HONG MINH TRUONG was identified as the current resident of 6602 Rosebud Drive, Rowlett, Texas.

8. TRUONG was documented in a 2002 Dallas Police Department (DPD) Report that stated the following narrative: TRUONG stated that he hears voices in his head. TRUONG stated the FBI, DEA, ATF, and police are after him and beaming radar into his body. TRUONG stated that the voices are telling him to do things he does not want to do. The June 2013 letter received by the Boston schools referenced similar statements to those reported in DPD report, "We are terrorist victim from Al-Queada FBI, Communist FBI and Nazi FBI in Texas. We let you all know to aware. They have been forcing and controlling us to do something to harm the America. They conspire against U.S.A and attack anywhere to murder on many ways American people."

9. Additional investigative methods, including a trash pull from TRUONG's abandoned trash, were conducted, and on May 27, 2014, resulted in the discovery of two pieces of paper containing the phrase "Address for FBI" typed in black ink. A black inkjet cartridge for a Dell model printer was also recovered from TRUONG's trash. An FBI Laboratory analysis concluded that the content viewed inside the serial white-powder hoax letters was typed using a black inkjet printer. A week later on June 3, 2014, utilizing the same method, law enforcement located pages one through twelve of a document that had been torn into pieces. After reconstructing the pages, law enforcement

discovered that the pages contained the addresses for FBI offices across the nation. Some of the hoax letters recovered from the recipients bore return addresses for various FBI offices. Past hoax letter recipients include U.S. Embassies, NASA, state governors, and other governmental offices and agencies.

10. Hoax Letters are typically mailed out in batches of 10-40 letters at one time. TRUONG's postal carrier was interviewed and stated that he has not picked up any suspicious or large batches of letters from TRUONG's house to be mailed.

11. On June 16, 2014, law enforcement observed a green colored Toyota Camry with TXLP MYX-424, occupied by TRUONG, dropping mail at external drop-boxes at the Garland Post Office, located at 1000 Walnut, Garland, Texas. Law enforcement marked the external drop-boxes used by TRUONG. Affiant and a United States Postal Inspection Service Inspector arrived at the location where the mail that TRUONG placed in the drop-boxes was identified. A total of three envelopes were identified as being mailed by TRUONG based on the return address. These envelopes were addressed to the Dallas Central Appraisal District and AARP. Photographs were taken of the three envelopes, and they were allowed to continue through the mail system for delivery because they were not believed to be included in the Hoax Letters because he included his name on the return addresses. Upon review, these envelopes were found to be similar to the envelopes received by different entities referenced in the ongoing investigation. The positioning of the stamp, the font used to address the envelopes, as well as the format and

structure used to address the envelopes, is consistent the Hoax Letters in this case. For example, the addressee on the envelopes TRUONG was observed mailing on June 16, 2014, as well as the envelopes for the Hoax Letters were type-written and began with “To:” or “TO:” followed by a name and address. Additionally, the Hoax Letters, which were also type-written, contained references to federal agencies using acronyms, such as FBI. In the Hoax Letters, the first two initials in FBI were followed by periods, but the final initial “I” was not followed by a period. The letters TRUONG was observed mailing on June 16, 2014, lacked a period after the second initial “O” in the acronym for post office. The chart below demonstrates the unique punctuation.

HOAX LETTERS PUNCTUATION	F.B.I
JUNE 16, 2014 MAILINGS PUNCTUATION	P.O

12. On July 22, 2014, an additional trash pull was conducted at 6602 Rosebud Drive, Rowlett, Texas. Law enforcement found a torn letter and envelopes in the trash that were type-written. The envelopes were addressed to Boston, Massachusetts- public schools (which were on the same website used to identify Truong’s IP address), and the document contained language similar to the language in the 519 previous hoax letters. In fact, the language in the letter was identical to the November 2013 letters, and the

contents of those letters were never released to the public. The reconstructed letter states in part:

We are terrorist victim from Al-Queada FBI (FBI working for International Al-Queada), Communist FBI and Nazi FBI in Texas. We let you all know to aware. They have been forcing and controlling us to do something. They conspire against U.S.A and attack anywhere to murder on many ways American people. They said "Headquarters "C" Division in Dallas and "L" Division in Houston Texas"


They will be sent something to kill people in America and people to relate to USA.

- 1- Poisonous letter or package in venom, poisonous organ of animals.
- 2- Chop, slice, dice and mash body of leeches and put them in food store, let people eat it.
- 3- Package acid bomb (sulfuric and nitric).
- 4- Biology letter in H1N1, H5N1 and Anthrax
- 5- Herbal bomb in poisonous flower or tree.
- 6- Chemical bomb in Sarin gas, cyanide, small bomb in theater and night club.

- 7- Hijack airplane from Love Field airport and Dallas-Fort-worth airport to attack Nasa Center. They bring chloroform to airplane make people to sleep and use autofly to control airplane to hit Nasa center or Empire Building.
- 8- Send poison to U.S.A oil rig.
- 9- Send poison and biology to U.S.A Submarine to kill American soldier.
- 13. They said "Attack all school it is easy target to success". . . .

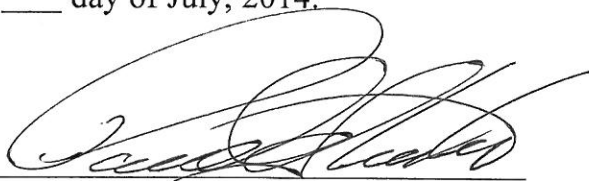
CONCLUSION

14. Based on the foregoing I have probable cause to believe that HONG MINH TRUONG has committed offenses against the United States as stated in Title 18 United States Code Section 1038(a)(1), that is false information and hoaxes in that on or about May 7, 2012, in the Northern District of Texas, and elsewhere, HONG MINH TRUONG intentionally conveyed false and misleading information, that is white powder, to Mi Escuelita Preschool Crossover, in Dallas, Texas, under circumstances where such information may reasonably have been believed, that indicated that an activity was taking place, that is transferring anthrax, a biological agent or toxin, that would constitute a violation of 18 U.S.C. § 175.



DAVID D. ROGERS II
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 25 day of July, 2014.



PAUL D. STICKNEY
United States Magistrate Judge